

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE

**IN RE: FLORA BOYD,
Debtor.**

**Case No. 15-27831-GWE
Chapter 13**

SELENE FINANCE, LP,

MOVANT

vs.

**FLORA BOYD, Debtor;
and SYLVIA F. BROWN, Trustee,**

RESPONDENTS

OBJECTION TO CONFIRMATION

Comes now Selene Finance, LP (hereinafter "Movant"), by and through its attorneys, Wilson & Associates, P.L.L.C., and for its Objection to Confirmation of the Chapter 13 plan proposed herein by the Debtor, Flora Boyd, states:

1. It is the servicer of a deed of trust and deed of trust note covering the real property commonly known as 1313 Ryanwood Avenue, Memphis, TN 38116. Movant and the debt secured by the real property are not listed in the plan. However, the plan lists Wilson & Associates as a secured creditor in the amount of \$82,900.00 at 5/25% interest with a payment in the amount of \$525.00 per month.

2. Pursuant to 11 U.S.C. §1324, Movant objects to the Chapter 13 plan because the plan fails to list Movant and the debt secured by the real property set forth in paragraph 1, above, and or fails to list Movant as a mortgage creditor with a monthly installment payment and an arrearage payment, when the estimated arrearages are \$38,658.25 and the monthly payment is \$800.96. Therefore, Movant is not adequately protected.

3. Therefore, the plan does not meet all of the requirements for confirmation.

WHEREFORE, Movant objects to confirmation of the Chapter 13 plan proposed herein by the Debtor, and prays that this Court deny such confirmation, for its attorney fees and costs herein, and for all other just and proper relief.

Respectfully Submitted,

WILSON & ASSOCIATES, P.L.L.C.
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By: Joel W. Giddens (16700)
 /s/ James Bergstrom (20622)
 Theodore K. Cummins (24381)

Attorneys for Movant

CERTIFICATE OF SERVICE

On October 5, 2015, a copy of the foregoing was served via electronic mail, hand delivery, facsimile or United States Mail, postage prepaid, upon the parties listed below.

Joel W. Giddens
/s/ James Bergstrom
Theodore K. Cummins

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